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10 Attorneys for Creditor,
11 GOLDEN BAY FENCE PLUS IRON WORKS, INC.

12 **UNITED STATES BANKRUPTCY COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

15 In re:	Bankruptcy Case Nos. 19-30088 (DM) (Lead Case)
16 PG&E CORPORATION	19-30089 (DM)
17 -and-	Chapter 11
18 PACIFIC GAS & ELECTRIC	(Jointly Administered)
19 COMPANY,	NOTICE PURSUANT TO 11 U.S.C. Section
20 Debtors.	546(b)(2) RELATED TO PERFECTION,
	MAINTENANCE AND ENFORCEMENT OF
	MECHANICS LIEN CLAIM

- | |
|---|
| 21 <input checked="" type="checkbox"/> Affects PG&E Corporation |
| 22 <input type="checkbox"/> Affects Pacific Gas and Electric |
| 23 Company |
| 24 <input type="checkbox"/> Affects both Debtors |

25 *All papers shall be filed in the Lead Case,
26 No. 19-30088 (DM)

27 PLEASE TAKE NOTICE that **Golden Bay Fence Plus Iron Works, Inc.** ("GBF" or
28 "Creditor") acted as a subcontractor on a PG&E San Francisco Service Center project located at 2180
Harrison Street in San Francisco, California and further described in the attached Mechanics Lien
("Property") under a certain Subcontract Work Order ("Subcontract"), dated October 25, 2018, by and
between GBF and Turner Construction Company ("Turner"). PG&E Corporation ("PG&E") is listed
as the owner of the subject property that comprises the construction project, which project is further
referred to as Project #171300 ("Project"). GBF was hired to provide chain link fencing, gate, loops

NOTICE OF PERFECTION OF MECHANICS LIEN (GOLDEN BAY FENCE IRON WORKS INC.)

1

1 and related labor, services, equipment, materials, and related construction work on the Project
2 (collectively, the "Work"). The Work under the Contract is a "work of improvement" as defined under
3 California Civ. Code § 8050(a).

4 Under California Civ. Code § 8414,

5 A claimant other than a direct contractor may not enforce a lien unless the claimant records a
6 claim of lien within the following time frames:

7 (a) After the claimant ceases to provide work.

8 (b) Before the earlier of the following time frames:

9 (1) Ninety days after completion of the work of improvement.

10 (2) Thirty days after the owner records a notice of completion or cessation.

11 Likewise, California Civ. Code § 8460(a) provides that,

12 (a) The claimant shall commence an action to enforce a lien within 90 days after
13 recordation of the claim of lien. If the claimant does not commence an action to enforce
the lien within that time, the claim of lien expires and is unenforceable.

14 Pursuant to 11 U.S.C. § 546(b), GBF hereby gives notice in lieu of the commencement of
15 any such action to perfect, maintain, or continue GBF's lien. Accordingly, GBF requests adequate
16 protection of its lien. A true and correct copy of GBF's lien recorded in San Francisco County is
17 attached hereto as **Exhibit A**.

18 GBF asserts a secured interest in the Property to the fullest extent allowed by applicable law,
19 including interest. Further, GBF reserves the right to supplement and/or amend this Notice, and
20 reserves any and all other rights under applicable law.

21 Dated: April 17, 2019

SWEENEY, MASON, WILSON & BOSOMWORTH

By: /s/ William M. Kaufman

JOSEPH M. SWEENEY, ESQ.

WILLIAM M. KAUFMAN, ESQ.

Attorneys for GOLDEN BAY FENCE IRON WORKS, INC.

CERTIFICATE OF SERVICE

25 I hereby certify that on April 17, 2019, a copy of the foregoing Notice of Perfection of
26 Mechanics Lien Pursuant to Section 546(b) was filed electronically with the Clerk of Court using the
27 CM/ECF system. Notice of this filing will be sent to all counsel and/or parties by operation of the
court's electronic filing system.

28 /s/ Carol L. Mueller

EXHIBIT A

Recording Requested By:

GOLDEN BAY FENCE PLUS IRON WORKS, INC.

When Recorded Return to:

Joseph M. Sweeney, Esq./William M. Kaufman, Esq.
SWEENEY, MASON, WILSON & BOSOMWORTH
983 University Ave., Ste. 104C
Los Gatos, CA 95032-7637



San Francisco Assessor-Recorder
Carmen Chu, Assessor-Recorder
DOC- 2019-K751312-00

Check Number 6996

Friday, APR 05, 2019 11:31:12

Ttl Pd \$92.00

Rcpt # 0005977807

VT1/DS/1-2

SPACE ABOVE THIS LINE FOR RECORDER'S USE

MECHANICS LIEN

1. **GOLDEN BAY FENCE PLUS IRON WORKS, INC.** ("Claimant"), claims a Mechanics Lien for the labor or services or equipment or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the **County of San Francisco**, State of California, and more particularly described as: **PG&E Site Security, 2180 Harrison Street, San Francisco, CA 94110; 401 Treat Avenue, San Francisco, CA 94110; 2225 Folsom Street, San Francisco, CA 94110; 3101 18TH Street, San Francisco, CA 94110; and 3140 18TH Street, San Francisco, CA 94110; APN: Block 3592, Lot 030.**

2. After deducting all just credits and offsets, the principal sum of **\$689,133.57**, together with interest at the rate of ten percent (10%) per annum from the date payment became due, is due Claimant for the following labor, materials, services or equipment: **Chain link fencing, gate, loops and related labor, services, equipment, materials, and related construction work.**

3. Claimant furnished the labor or services or equipment or materials, at the request of or under contract with: **Turner Construction Company, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612.**

4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: **PG&E Corporation, One Market Spear Tower, San Francisco, CA 94105.**

5. Claimant's address is: **4104 South B Street, Stockton, CA 95206.**

Dated: March 22, 2019

GOLDEN BAY FENCE PLUS IRON WORKS, INC.

By: 
NICHOLAS CHAVEZ, OFFICER

VERIFICATION

I, **NICHOLAS CHAVEZ**, am an **OFFICER** of Claimant on the foregoing claim of Mechanics Lien. I am authorized to make this verification for and on its behalf. I have read the foregoing claim of Mechanics Lien and know the contents of the claim of Mechanics Lien to be true of my own knowledge, except for those matters stated on my information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: March 22, 2019


NICHOLAS CHAVEZ

**NOTICE OF MECHANICS LIEN AND PROOF OF SERVICE AFFIDAVIT
FOLLOW ON NEXT PAGE**

**NOTICE OF MECHANICS LIEN
ATTENTION!**

Upon the recordation of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date that mechanics lien is recorded.

The party identified in the mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required stop in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

PROOF OF SERVICE AFFIDAVIT
California Civil Code Section 8416 (a)(7), (c)(1)

On April 1, 2019, I, Carol L. Mueller, served a copy of this MECHANICS LIEN and NOTICE OF MECHANICS LIEN by U.S. Certified Mail, evidenced by a certificate of mailing, postage prepaid, addressed to the following owner(s) or reputed owner(s), AND lender(s) or reputed lender(s) of the property:

Reputed Owner(s):

PG&E Corporation
One Market Spear Tower
San Francisco, CA 94105.

Reputed Lender(s):

N/A

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: April 1, 2019



Carol L. Mueller